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(1904-1988)

October 2, 2009

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By ECF

Honorable Lois H. Goodman, U.S.M.J.  
Clarkson S. Fisher Federal Building  
402 East State Street, Room 6052  
Trenton, New Jersey 08608

Re: Torres-Hernandez and Ramirez v. CVT Prepaid Solutions  
Docket No. 3:08-cv-1057-FLW-TJB  
File No. 13499-1837

Dear Judge Goodman:

Together with the law firm of Shefsky & Froelich Ltd., we represent the defendant CVT Prepaid Solutions, Inc. (CVT). During an August 28, 2009 status conference we advised the Court and counsel of CVT's intention to file a petition for voluntary bankruptcy under Chapter 7 of the United States Bankruptcy Code. In an Order memorializing that conference, the Court directed CVT to provide a status report which we now do.

I am informed by co-counsel Bart O'Brien, Esq. of Shefsky & Froelich that: CVT is working with separate bankruptcy counsel to prepare the necessary documents and schedules required to support the petition; filing of the bankruptcy petition is complicated and delayed by the recent decision to file separate Chapter 7 bankruptcies for two wholly-owned CVT subsidiaries; and, the filing of these bankruptcies will occur at the same time as CVT files its bankruptcy petition.

Under these circumstances, CVT requests that this Court continue to stay discovery pending further order of the Court and proposes providing the Court with a status report on or before November 2, 2009.

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We thank you for your consideration and await your advice.

Respectfully yours,

*/s/ Steven Menaker*  
Steven Menaker  
For the Firm

SM:mr  
c: All counsel of record by ECF